

The Honorable John C. Coughenour

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

October 1, 2024
By Kavi Subramanian, Clerk
Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

NO. CR24-058 JCC

SUPERSEDING INDICTMENT

v.

JUSTIN BAKER,
Defendant.

The Grand Jury charges that:

COUNT 1

(Abusive Sexual Contact)

On or about March 14, 2024, within the special aircraft jurisdiction of the United States, that is, while aboard an aircraft in flight traveling nonstop from Burbank, California, to SeaTac, King County, Washington, within the Western District of Washington, and elsewhere, JUSTIN BAKER did knowingly and intentionally engage in sexual contact with Victim 1, that is, touch Victim 1's genitalia, breast, groin, and buttocks, without Victim 1's permission and with the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

1 All in violation of Title 18, United States Code, Section 2244(b), and Title 49,
2 United States Code, Section 46506(1).

3 **FORFEITURE ALLEGATION**

4 The allegations contained in Count 1 of this Indictment are hereby realleged and
5 incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the
6 offense alleged in Count 1, JUSTIN BAKER shall forfeit to the United States, pursuant to
7 Title 18, United States Code, Section 2253(a)(2) and (3), all property used to commit or
8 to facilitate commission of the offense and any proceeds of the offense.

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1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
2 any act or omission of the defendant,

- 3 a. cannot be located upon the exercise of due diligence;
4 b. has been transferred or sold to, or deposited with, a third party;
5 c. has been placed beyond the jurisdiction of the Court;
6 d. has been substantially diminished in value; or,
7 e. has been commingled with other property which cannot be divided
8 without difficulty,

9 it is the intent of the United States to seek the forfeiture of any other property of the
10 defendant, up to the value of the above-described forfeitable property, pursuant to
11 Title 21, United States Code, Section 853(p).

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13 A TRUE BILL:

14 DATED: 10/1/24

15 *Signature of Foreperson redacted pursuant*
16 *to the policy of the Judicial Conference of*
17 *the United States.*

18 _____
19 FOREPERSON

20 _____
21 TESSA M. GORMAN
22 United States Attorney

23 _____
24 AMY JAQUETTE
25 Assistant United States Attorney

26 _____
27 GRACE W. ZOLLER
Assistant United States Attorney